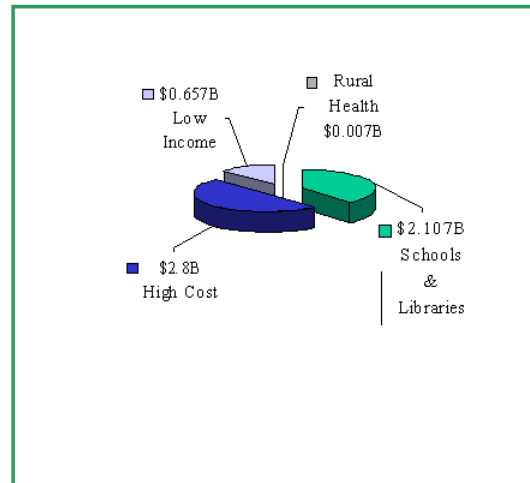




Federal Universal Service Fund : \$5.5 Billion per Year

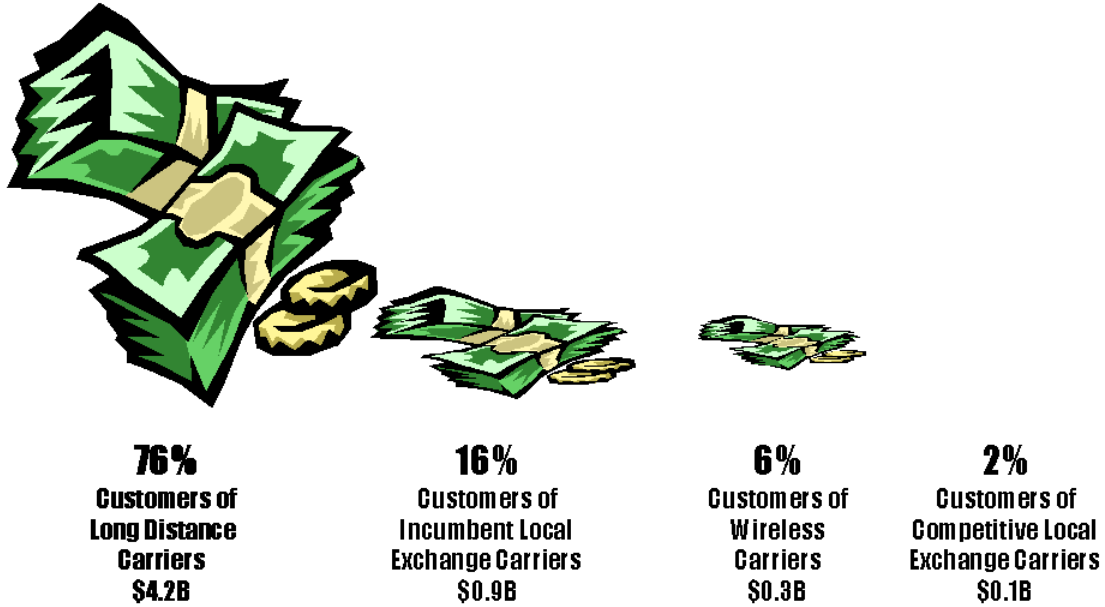
- High cost fund keeps rural rates affordable
- Low income households receive inexpensive Lifeline service and discounts for initial connection charges
- Schools and libraries receive e-rate discounts for equipment, wiring, and Internet connectivity
- Rural health care providers receive telecom discounts for telemedicine applications



\$5.5B Fund Will Continue to Grow

- Bush administration projects \$7.9 billion by 2006
- “MAG” plan will increase USF between \$500-\$800m a year
 - Effective 7/1/02
- FCC opens proceeding on low income household participation
- FCC opens proceeding on expanding implementation of section 254 to include advanced services
- Remand of FCC’s Ninth R&O creates risk of larger fund
- Fund could increase further if more customers in high cost areas acquired multiple lines

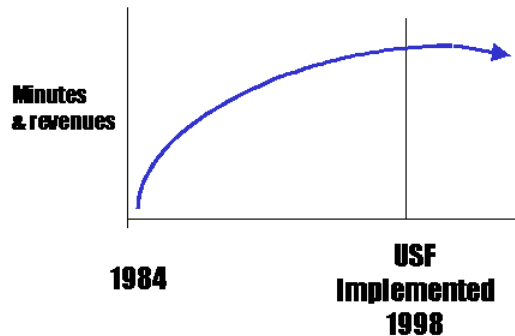
Who pays the \$5.5 billion ? Customers!



How does the universal service fee appear on monthly customer bills?

- Long distance customers: a percentage charge on revenues, in 8-9.9% range
- ILEC customers: a per line charge, typically in the range of \$0.35-\$0.45
- Wireless customers: a per line charge, typically in the range of \$0.40-\$0.53

Fundamental change has occurred in the long distance market



- Long distance voice revenues and interstate switched minutes are in sustained decline – reflected as 2.5% decline in contribution base between 1Q01 and 2Q01
- Glut in long-haul capacity put substantial downward pressure on prices
- Wireless successfully substituting for traditional long distance service
- Instant messaging and e-mail also are substitutes
- Future: Voice on Internet

**With the amount to be collected by long
distance carriers chasing fewer long
distance minutes and revenues ...**

**... each remaining minute or dollar of revenue
must bear a heavier burden.**

The result -- *retail surcharges increase.*

Revenue-based system has measurement problems

- **Wireless carriers sell blocks of minutes, and cannot distinguish interstate from intrastate revenues**
 - Use “default” allocator that understates interstate usage
- **Most industry experts agree that carriers will increasingly sell certain “bundles” of interstate and intrastate services, CPE, enhanced services**

WorldCom's Proposal

- **Eliminate revenue-based assessment**
- **Replace with a connections and capacity assessment on the interstate telecommunications provider that “owns” the end user customer**

WorldCom's proposal: residential

- **USAC to assess carriers based on wireline and wireless interstate connections**
 - \$1 per connection per month
 - Lifeline assessed nothing
- **Pagers assessed at \$0.25 per month**

WorldCom's proposal: business

- **USAC assesses on interstate network connections and capacity**
 - Single-line business (wireline and wireless) at \$1; pagers at \$0.25
 - Residual multi-line business (wireline and wireless) base charge \$2.50 - \$3.25:

<u>Level</u>	<u>Facility Capacity</u>	<u>USF Contribution Rate</u>
1	Less than 1.544 Mb/s	Base multi-line business USF charge
2	1.544 Mb/s (T-1) up to 45 Mb/s	5 X (base MLB USF charge)
3	45 Mb/s (DS-3) or greater	40 X (base MLB USF charge)

Who pays under WorldCom's plan?

- Carrier who “owns” the customer for the purpose of providing the connection is assessed
 - ILECs based on loops provided to their end users (loops are legally considered interstate, as well as intrastate)
 - Competitors who provision end users from their own loop facilities, via UNE-P or unbundled loop, or using interstate special access
 - Wireless carriers based on the number of “connections” (more easily counted than interstate revenues)

Advantages

- Competitively and technology neutral
- As network evolves from PSTN to Internet, system based on connections is stable and predictable
- No need to assess dot.coms for VoIP revenue
 - Revenue allocation issues – an unploughed field
- Facilitates flat fee recovery

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Proposal complies with the Act

- Upon whom should the obligation to contribute to universal service fall?
 - “All interstate telecommunications providers”
- How should contribution be apportioned among interstate telecommunications providers?
 - Not prescribed by the statute; assessment must be equitable and nondiscriminatory
- No conflict with 5th Circuit decision

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Recovery of USF Contributions, cont'd

- **Lifeline consumers pay zero in USF surcharges**
 - Carrier providing connection knows who its lifeline customers are
- **Surcharge name**
 - Due to billing systems limitations, allow names similar to, but shorter in length than, “Federal Universal Service Charge,” e.g., Fed Universal Svc Charge.

Need to move expeditiously

- **Every financial quarter, interstate revenues decline**
 - AT&T year over year revenues decline in 2Q01 was 5.9%, including residential decline of 19.8%
 - WorldCom business voice revenues declined 6% 2Q01 vs 1Q01 and residential declined 16+%
- **Increases in interexchange customer fees are not a helpful foundation for future health of universal service system**